

1 writers themselves.

2 MS. KADERLY: They're supposed to be. We're  
3 supposed to be doing that, yeah.

4 MR. HITTE: Right. Right, that's all others.

5 I just wanted to say, are you saying  
6 you'd like to see EPA house a Web site that would  
7 have all of the Title V permits issues?

8 MR. HARLEY: Yeah, I think that that would be  
9 a wonderful idea.

10 MR. HARNETT: Keri Powell.

11 MS. POWELL: Hi, Keith. Thank you for  
12 coming.

13 You spoke a lot about the need to  
14 utilize the compliance schedule aspect of Title V  
15 more effectively.

16 Have you ever seen a permit that is  
17 using the compliance schedule requirement in a way  
18 that you think is effective?

19 MR. HARLEY: No.

20 MR. HARNETT: Thank you very much for your  
21 time.

22 MR. HARLEY: Thank you.

23 MR. HARNETT: Appreciate you coming in.

24 The next speaker is Dale Kalina from

1 RR Donnelley.

2 MR. KALINA: Good afternoon. My name is Dale  
3 Kalina. I'm with RR Donnelley Company. I've got  
4 about 19 years' experience in the printing  
5 industry, working primarily on issues dealing with  
6 air and air permitting for our facilities across  
7 the country.

8 I've also been fairly heavily involved  
9 in a lot of industry efforts, including the EPS  
10 commonsense initiative, the P4 program, some MACT  
11 development on NESHAPs that affect our industry.

12 Our company has approximately 40 FESOP  
13 and Title V facilities out of roughly 70  
14 manufacturing operations, and these FESOP, Title V  
15 facilities are located in approximately 15 states  
16 across the U.S.

17 After sitting in the audience for the  
18 better part of the day, without the ability to  
19 throw in my two cents worth, I felt the need to  
20 sign in as a walk-in, and so my thoughts may be a  
21 little disorganized. They were kind of scribbled  
22 at lunchtime, and hopefully I can read my  
23 handwriting. So please bear with me.

24 Looking at the sheet that was handed out

1       with some of the questions, how is Title V  
2       working, et cetera, I guess from our company's  
3       perspective, it is working generally okay. All of  
4       our permits, the initial permits at least, for all  
5       of our facilities have been issued with varying  
6       degrees of effort on our part and on agency's  
7       parts, as well as quality and content of those  
8       permits.

9               I think the key point is -- for everyone  
10       on this is that we are all still learning how to  
11       work the process. There was a huge focus eight or  
12       nine years ago, whenever the programs rolled out,  
13       in various states on putting together an  
14       application and what did an application require,  
15       what was the content? All the -- was it going to  
16       be the monster that -- you know, the 6 three-ring  
17       binders that everybody anticipated, or was there a  
18       good way to do something smarter than that.

19              Then came the permits and developing the  
20       compliance programs, documentation of checks and  
21       balances that were necessary there.

22              Now we've got into permit modifications.  
23       We've got the permits. How do we make the changes  
24       that we need to do as new processes are brought in

1 on-line, as new equipment is brought into place.

2 Moving into the renewal process, getting  
3 into the CAM requirements, all those sorts of  
4 things, it has been an evolution and quite an  
5 education, not only for us in the industry but  
6 also for the agencies, and obviously based on some  
7 of the comments and testimony today, for the  
8 general public as well.

9 Where is Title V working well? There  
10 are a number of areas where I think we've seen a  
11 lot of benefit of the Title V program. We've seen  
12 a generally good consolidation of the terms and  
13 conditions. I think having all of the  
14 requirements in a single document has been a huge  
15 help for our understanding of what we need to do,  
16 and there has been some streamlining of  
17 conditions, although in my opinion not enough.

18 But a lot of the gray areas that I think  
19 were included in old construction permits and old  
20 operating permits that were just kind of  
21 conditions that were out there that nobody paid  
22 attention to have received -- either have been  
23 clarified, removed, or at least received the  
24 appropriate attention that they require.

1           I think that it's resulted in a better  
2       understanding of our compliance requirements, and  
3       also by the agencies of what they are expecting of  
4       us, and hopefully to the public as well.

5           The awareness level within our  
6       organization, I think, has increased incredibly in  
7       terms of what the compliance requirements for air  
8       permits need to be. This, as someone commented  
9       earlier today, used to be the job of the  
10      environmental person who got no respect, got no  
11      support, and had to do all the work. That has  
12      changed significantly.

13          Senior management in our facilities are  
14      very aware of what the requirements are. They're  
15      very concerned that we're meeting those  
16      requirements. They are asking the tough questions  
17      of their employees to make sure that the  
18      compliance certifications that they are signing  
19      off on, on a regular basis are true -- truly  
20      represent what's going on in the facility.

21          And it's brought the anticipated focus  
22      on our ongoing compliance. So that people are  
23      certainly much more aware that if they're changing  
24      processes, if new equipment is coming in, there

1       are protocols that need to be followed, and I  
2       think that's been a huge help in our operations.

3               It's also resulted in much better  
4       documentation of compliance. It used to be, you  
5       know, with -- if there was a stack test required  
6       every so often and maybe a report, emissions  
7       report due once a year, whatever, those things  
8       would get done. But in terms of maintenance, in  
9       terms of documentation, of other operating  
10      parameters, monitoring requirements, et cetera, I  
11      think it is really, again, heightened that  
12      awareness and made our operations perform better  
13      and has put that focus on demonstrating  
14      compliance, both internally to our understanding  
15      the requirements and demonstrating that  
16      internally, but also documenting that on an  
17      external basis.

18             Another area I think that has worked  
19      well is the availability of information. This  
20      kind of piggybacks on some of the conversation we  
21      just had.

22             Region 5, I think, has done a great job  
23      of posting the Title V permits, FESOP permits, and  
24      a lot of construction and other permits on their

1       Web site for the states in Region 5. It's a big  
2       help, I think, in getting that access information  
3       out to the public, but also looking at what's  
4       happening, how other states are dealing with  
5       similar issues I think is helpful to us as we  
6       approach dates and strategies, and hopefully  
7       they're sharing this information.

8               What's working poorly? One of the  
9       things that has hit us significantly and certainly  
10      in recent times is permit processing time lines  
11      for new construction. I do not believe that a lot  
12      of agencies had anticipated how new construction  
13      permits would be issued and rolled into Title V  
14      permits in a timely and effective way, and we've  
15      seen a shifting landscape in a number of states in  
16      terms of what hoops we have to jump through, what  
17      the public comment requirements are for  
18      construction, and how that all happens.

19             Obviously, for a lot of organizations,  
20      getting a quick approval of the authority to  
21      construct a source is very, very important, with  
22      long lead times for installation of equipment, and  
23      making sure that there is still an effective way  
24      for construction permits, for authorization to

1       construct new sources or modify sources is vital,  
2       and if that gets dragged down, as resources are  
3       pulled away to dealing with Title V issues or  
4       whatever, that's a situation that it creates  
5       significant problems for industry.

6                Another area is some permits, not all,  
7       have a lot of inflexibility built into this. We  
8       heard a little bit this morning about flexible  
9       permits, and -- my mantra is more let's not make  
10      them more inflexible than they need to be. The  
11      changing of emission limitations, for example, is  
12      one thing where flexibility has been taken out of  
13      existing permits as Title V has rolled around.

14             The what I call the staple approach in  
15      permits is an issue, where facilities spent weeks  
16      and months of time preparing a, you know, a  
17      perfect application only to find out that the  
18      Title V permit that they were issued, or basically  
19      their old permit stapled together with a few  
20      general provisions tacked onto the front or back  
21      with some additional monitoring and reporting  
22      requirements. A lot of wasted effort on a lot of  
23      people's parts.

24             And finally, a lot of pushback that we



1 get from the states is that, "Well, we understand  
2 what your issues are. We'd like to help you, but  
3 people in Region X will not agree to this, people  
4 in RTP will not agree to this, legal will not  
5 agree to this," whomever, and so a lot of the  
6 issues really hinge on this phantom person, who --  
7 who nixes every innovative idea that's put forth.

8 Applicability issues in permits have  
9 been a concern. One that's come up for us a lot  
10 recently is CAM applicability, and this is yet to  
11 be resolved, where there are NESHAPs regulating  
12 volatile organic hazardous air pollutants, where  
13 there has been a mixed response in terms of  
14 whether those are appropriate CAM -- whether they  
15 supersede the CAM applicability requirements for  
16 VOC sources.

17 Other issues are unreasonable  
18 monitoring, as was touched on a little before; the  
19 per shift visible emissions is one of my  
20 favorites. In Indiana we had a facility that had  
21 a permit with once-per-shift visible emissions  
22 will be conducted on a variety of sources. We  
23 went back to the state and said, "Well, in the  
24 winter months in Indiana, the third shift has no

1 daylight hours, and also when it rains or snows or  
2 whatever, doing visible emissions is a problem."

3 The response was, "Well, you know, we  
4 understand that you will not be required to do it  
5 under those conditions," and yet we have a permit  
6 that says once-per-shift visible emissions shall  
7 be conducted. Again, it creates compliance  
8 certification issues.

9 Some general points on Title V.  
10 Monitoring has been touched on a lot. There has  
11 been some overkill, I think, in monitoring.  
12 Proposals that have been put forth where process  
13 monitors have been -- have been deemed to be  
14 compliance assurance monitors. We have tried very  
15 hard to build in sort of a Plan B approach to  
16 this. So that if our primary monitoring approach  
17 should fail us for some reason, for example, if  
18 we've got a temperature recording and monitoring  
19 provision, should the monitor fail, we've got  
20 something built -- we've tried to build into the  
21 permit some alternative monitoring proposal so  
22 that in situations where the primary monitor  
23 fails, we've already got preapproval. And if we  
24 conduct the Plan B monitoring, we do not have a

1 deviation or a permit violation. We've had some  
2 success in dealing with that.

3 By supplementing things with interlocks,  
4 manual recording, other areas, we've had some --  
5 some effectiveness there.

6 One area that is a very confusing area  
7 that I personally find is modifications of Title V  
8 permits. What constitutes if I were to be a ten  
9 change versus a minor permit modification versus a  
10 significant permit modification?

11 We have posed the same project to  
12 different people, that is at a given agency, and  
13 got three different responses. Had some people  
14 tell us that it's an operational flexibility  
15 issue; others that it's a minor modification;  
16 others that it's a significant modification.

17 I don't think it's understood at all, or  
18 by very few people, in terms of what can fall into  
19 what category. State of Indiana basically says  
20 that any change it has in new recordkeeping  
21 requirement is a significant permit modification,  
22 regardless of the size of the project apparently.  
23 So there is a lot of confusion, a lot of  
24 interpretation of those various issues.

1           Timing, as I mentioned earlier, is a  
2           huge issue on getting these permit revisions. And  
3           if new projects could not be approved in a  
4           relatively expeditious fashion, that creates  
5           significant problems on businesses.

6           Just kind of a side note, we've had some  
7           situations where we have requested permit  
8           modifications and have only discovered that the  
9           permits have been modified by seeing them posted  
10          on the Region 5 Web site. The agency did not  
11          bother to send us a revised copy of the permit,  
12          which makes compliance certifications a bit of an  
13          issue as well.

14          Deviations; I think we've been fairly  
15          effective in terms of defining what requires  
16          prompt and what doesn't require prompt  
17          notification. And basically, you know,  
18          recordkeeping issues, et cetera, we've -- I think  
19          we've done a decent job of defining.

20          A question was asked earlier about  
21          temperature monitoring on an oxidizer, for  
22          example. We've tried where possible to build into  
23          the permit some definition of what type of  
24          temperature excursion would trigger that, how long

1       you have to be below that temperature to trigger  
2       it, as opposed to every time you get a 15-second  
3       dip below the required temperature, is that  
4       something that you need to report.

5               Incorporation by reference has been  
6       talked a lot about. I guess I'm kind of -- having  
7       heard the discussion, it looks like the citation  
8       approach would be beneficial, the most beneficial.  
9       We've seen both extremes. Just citing a  
10      regulation I find to be an unsatisfactory -- just  
11      the general regulation, comply with subpart X,  
12      doesn't help us a lot because we've still got to  
13      do the deeper dive to determine what that  
14      requirement is, and for compliance certifications  
15      do all that homework.

16             But on the other hand, there is  
17      obviously no point in cutting and pasting the  
18      entire regulation. So citing the applicable  
19      requirements of a MACT or an NSPS requirement I  
20      think makes a lot of sense.

21             I guess in the interest of time, my  
22      final comment really is in regards to the timing  
23      issue, and my belief is that there is a need for  
24      more general permits, more permit by rule

1       approaches, or more template approaches that could  
2       be used as a standard for those facilities who  
3       wish to take that approach, not only for speed of  
4       issuance hopefully, but also a consistent sort of  
5       defined and understandable requirements that are  
6       transparent to the agency and to the applicant, so  
7       that they can obtain what they need, again, if the  
8       shoe fits.

9               With that, I will conclude my comments.  
10       Thank you very much.

11              MR. HARNETT: Thank you.

12              Michael Ling.

13              MR. LING: Hi. I appreciate your comments in  
14       reacting to some of the issues we already heard  
15       today.

16              My question was about your statement,  
17       the first issue that you identified was that Title  
18       V is causing delays in permitting for new  
19       construction, and I just wanted to ask you to  
20       clarify. Are you saying that it's Title V that's  
21       adding requirements or adding delays over and  
22       above the delays that would be otherwise present  
23       in the construction permitting program? Or was it  
24       more the shifting of resources that you talked

1       about?

2               MR. KALINA: I think it's a combination of  
3       the two. We've had some states that have gone to  
4       a single approach, where the new construction  
5       permit is also a revised Title V operating permit,  
6       and the state of Kentucky comes to mind as one of  
7       those. They originally did that. They have since  
8       changed that approach a little bit. But in that  
9       case, rather than a simple construction permit  
10      that would then modify the Title V operating  
11      permit with the appropriate public comment period,  
12      they rolled that into a single process, which in  
13      my mind slowed the issuance of the construction  
14      permit by at least 45 to 60 days.

15              They have since now got to an approach  
16      where once the draft permit is issued, that  
17      construction can begin, and then there is still  
18      the public comment period before operation, which  
19      is -- which is a better approach.

20              But there again, some of it -- it's a  
21      learning curve that I think the agencies are going  
22      through as well, just how to deal with these  
23      issues.

24              MR. HARNETT: Bob Palzer?

1           MR. PALZER: Thank you very much for coming.

2           It was very good overview.

3           Your company, as a lot of other  
4           companies, deal with facilities in lots of  
5           different states and different regions.

6           If I missed it, have you noticed  
7           differences between different regions, and are  
8           there lessons learned as to what sort of things  
9           work better for you in certain places, and are  
10          more problematic in others?

11          MR. KALINA: Well, I guess the first -- to  
12          answer the first part of your question, I -- I see  
13          very little consistency between any two states or  
14          any two regions that we deal with. Every state  
15          has a somewhat different approach. Some of them  
16          have been -- have been historically good states to  
17          work with and continue to be cooperative,  
18          responsive. Others have been very slow and  
19          continue to be very slow and perhaps are even  
20          slower now than they were before. And even within  
21          a given region, the differences are significant.

22          I think a lot of it is -- a lot of it is  
23          a resource issue. I do believe that a number of  
24          states are having an extremely difficult time



1       administering the Title V program and all of their  
2       environmental programs due to turnover, due to  
3       inexperienced staff, and the inability to retain  
4       staff. I don't know how many different permit  
5       engineers we have worked with for a given facility  
6       in one state, where every time we go in with a  
7       different application, the whole education process  
8       starts over again.

9               It's frustrating at times. You know,  
10       obviously you get a new permit engineer who wants  
11       to do a good job, and we obviously want them to do  
12       a good job, but I think a lot of times they're  
13       thrown into the deep end of the pool and are, you  
14       know, learning as they go along, and without some  
15       experience under their belt, obviously the quality  
16       of the work may suffer, the amount of review time  
17       may suffer, the workload on a lot of these permit  
18       engineers has got to be incredible as well.

19              Also -- this is one of my favorite  
20       stories, totally off topic, but the State of  
21       Kentucky a year and a half or so ago decided that  
22       they were going to improve their permit issuing  
23       process, so they pulled all their permit engineers  
24       off issuing permits and put them on some sort of

1 permit improvement team for several months, so  
2 that they created this huge backlog for themselves  
3 by trying to improve their process.

4 They're in a very tough position  
5 obviously. They feel that industry is breathing  
6 down their neck, that the regions are breathing  
7 down their neck, and the community organizations  
8 and environmental justice organizations are doing  
9 the same. So they feel they're getting it from  
10 all directions, and obviously they're overworked  
11 and in many cases I think very much underpaid. So  
12 it's a tough situation for them.

13 But no -- I think there are some  
14 programs that work well. I don't know how -- I'm  
15 not -- don't have enough intimate knowledge of how  
16 the programs are organized to understand why  
17 they're working better than others, but there are  
18 some that work very effectively, and there are  
19 others that, you know, if you can get a permit  
20 modification done in nine months, you feel like  
21 you've had a huge success, which unfortunately for  
22 a lot of businesses could mean the failure of a  
23 project, with those kind of time lines.

24 MR. PALZER: Thank You.

1           MR. HARNETT: Don van der Vaart.

2           MR. VAN DER VAART: Let me get a little more  
3           specific. Dr. Palzer is always in the abstract.  
4           I'm an engineer.

5                     How many days public notice and how many  
6           days EPA review go along with a significant  
7           modification? Do you remember that? Is it --

8           MR. KALINA: It's 30 day public, 45 --

9           MR. VAN DER VAART: Yeah, I got it. We're on  
10          the same wavelength.

11                    Let me ask you in your various -- this  
12          is great to have somebody here that's got  
13          facilities in different regions.

14                    Do all of your significant modifications  
15          go through a sequential 30-day and then 45-day, or  
16          are there some --

17          MR. KALINA: Generally simultaneous --

18          MR. VAN DER VAART: OH.

19          MR. KALINA: (Continuing) -- that the 30 and  
20          45-day start at the same time.

21          MR. VAN DER VAART: Interesting. So you  
22          would say at least in some places you get  
23          parallel, let's call it parallel processing.

24          MR. KALINA: Correct.

1 MR. VAN DER VAART:

2 Okay, Steve, I think you and I need to  
3 talk.

4 MR. HARNETT: Richard Van Frank?

5 MR. VAN FRANK: How often have you  
6 encountered ghost written permits, meaning there  
7 is a state permit writer who claims to have  
8 written the permit, but in reality the permit has  
9 been written by a consultant someplace else in the  
10 world?

11 MR. KALINA: I don't know of any -- well,  
12 if -- if they are well ghost written, I guess I  
13 wouldn't know.

14 The only instance that I am aware of is  
15 in Indiana, where they have contracted with an  
16 organization in New Jersey to work on permits for  
17 them, and they have outsourced a fair number of  
18 those permits, I assume just because of resource  
19 constraints.

20 But in terms of other states, I do not  
21 know for a fact, and in fact generally -- well,  
22 actually I do know that we just got a Title V in  
23 Mississippi that was developed by an outside firm.  
24 So there are at least a couple states that are

1       doing it.

2               MR. VAN FRANK: Well, do you feel there are  
3       quality problems with those permits, or would you  
4       rather not say?

5               MR. KALINA: To be honest, we've had in-house  
6       permits issued in Indiana and we've had the  
7       contractor-issued permits. And I would say the  
8       level of quality is comparable between the two,  
9       without saying whether that's high or low.

10              MR. VAN FRANK: Okay, thank you.

11              MR. HARNETT: Bob Morehouse?

12              MR. MOREHOUSE: You commented, Dale, on the  
13       challenges with changing permit engineers and the  
14       education process.

15                     Do you have any sites that have multiple  
16       Title V permits? And if so, have they had  
17       different permit engineers and challenges that  
18       creates with different views, different engineers,  
19       one site?

20              MR. KALINA: We do not have any facility that  
21       has more than one Title V facility for the  
22       property. We do have a -- three facilities in one  
23       geographic location in Pennsylvania that have all  
24       been handled by a single permit engineer, which I

1       have found to be incredibly helpful, especially as  
2       that engineer -- that person has had more  
3       experience.

4               Also, those -- kind of getting back to  
5       some of the other points -- in that situation and  
6       in several others, Ohio being another case in  
7       point that I can think of, where the permit  
8       engineer also comes out and does a routine  
9       inspection of the facility, and those type of  
10      situations I find to be incredibly more beneficial  
11      than if you just got a permit writer who sits at a  
12      desk and never has seen an operation and only  
13      knows that there is -- there is a bunch of regs  
14      that he has to work into a permit somewhere,  
15      without knowing really what's going on.

16             On the flip side of that, we do have --  
17      in several states we do have multiple facilities  
18      with Title V permits, where they've been handled  
19      by different permit engineers, and there are some  
20      but not -- I wouldn't say significant differences  
21      in how they've been approached.

22             It does appear that there is some --  
23      there is some inconsistency, but I think in  
24      general the approach that has been taken has been

1       pretty decent across the board on those  
2       facilities. So I'm not seeing huge differences  
3       within a state.

4               Where it does get much more complicated  
5       are states like Ohio and Pennsylvania, where  
6       you've got regional offices or district offices,  
7       where within a given state you may get very  
8       different approaches to the same type of facility,  
9       depending on which region you're located in, even  
10      though you're playing by the same set of rules.

11             MR. HARNETT: Keri Powell.

12             MS. POWELL: I'd just like for you to discuss  
13      a little bit further your ideas about making  
14      significant modifications quicker, and to be more  
15      specific, I mean, you've said that in general the  
16      EPA review and the public review takes about  
17      45 days.

18             Can you tell me generally how long from  
19      start to finish it takes the overall process to be  
20      done, the amount of time that you think would be  
21      reasonable for the process to take, and what your  
22      ideas are for streamlining it?

23             MR. KALINA: Well, I need a soapbox for this  
24      one.

1           The time frames, unfortunately, are all  
2       over the map. There have been a few states where  
3       processing can be extremely quick, and I will say  
4       that the Illinois EPA has been one agency that has  
5       been extremely responsive by and large. Where a  
6       complete application can be acted upon, and a  
7       permit issued for public comment, if one is  
8       necessary, oftentimes in less than 30 days.

9           On the flip side of that, there are  
10      other agencies where if you get any response  
11      within six to nine months, you feel fortunate.

12           In addition to that, even though the  
13      comment periods may only be 30 to 45 days, we have  
14      had delays -- and this may sound trivial, unless  
15      you're -- you've got the backhoe out there waiting  
16      to start moving dirt around to do the  
17      installation -- where it has taken a week to  
18      ten days for the public notice to get out of the  
19      agency to be published in the newspaper to begin  
20      the 30-day public comment period. We've had  
21      instances where once the comment period has been  
22      closed with no comments, it's taken two to  
23      three weeks for the final permit to be issued.  
24      And those types of delays are the absolute



1       frustrating ones.

2               You know, it's one thing to have a  
3       complicated application and take some time to work  
4       through and get the permit issued, but to have  
5       delays of weeks or a month or more just through  
6       administrative bureaucracy is terribly  
7       frustrating.

8               There are a few programs that I think  
9       have worked very well. As I mentioned, some  
10      general permits are permit-by-rule-type approaches  
11      for kind of generic sources. You know, a small  
12      boiler or something like that. I think has a lot  
13      of merit that if you meet certain criteria, the  
14      conditions are pretty much established, and it's a  
15      fairly simple process as long as you're not  
16      triggering some more significant concerns.

17              Indiana, for all of its warts, does have  
18      an interim construction permit process that allows  
19      a facility with a fairly expedited approach to  
20      begin construction of a source, but still requires  
21      that the operating permit be modified or issued  
22      before operation can begin, and there is some risk  
23      to the source in going through that process.

24              But at that, at least for a long-term

1 project that may take several weeks or months of  
2 construction, it gets -- allows the facility to  
3 begin the process, which I think has a lot of  
4 merit.

5 As I mentioned, there are some other  
6 states now that, and the example of Kentucky that  
7 I gave, that at least, again, allows the  
8 construction of the source but not the operation  
9 until the permit has been modified. That's helped  
10 to streamline that process somewhat.

11 But, you know, if -- in a perfect world,  
12 you know, if we could get a -- from the receipt of  
13 a complete application to the issuance of a  
14 permit, if we could do that in 90 to 120 days, I  
15 think by and large that would make a lot of the  
16 issues go away. If we could begin construction in  
17 a time frame shorter than that, that obviously  
18 would be a huge benefit because there is the  
19 urgency to make changes that is very huge, and I  
20 don't think we can emphasize that enough.

21 But obviously if there is a requirement  
22 for a public comment period, making sure that that  
23 can be moved through the system in a timely  
24 fashion, without cutting corners, without

1       neglecting those requirements is obviously  
2       something else that would be helpful. So anything  
3       that can be done to eliminate that administrative  
4       time that it delays without adding any value would  
5       be very important.

6               MR. HARNETT: I'm going to have to cut off  
7       questions here at this point. Thank you very much  
8       for coming here.

9               I'm sorry. We're going to stick very  
10       hard to our schedule because we've really taxed  
11       our court reporter today with a very long day, and  
12       we still have two speakers to go before the dinner  
13       hour.

14               The next speaker is Brian Urbaszewski of  
15       the American Lung Association in Chicago.

16               MR. URBASZEWSKI: I'll try to be brief. I  
17       realize it's been a very long day for everybody.  
18       A lot of what I would cover has probably already  
19       been touched on by two people who testified  
20       earlier today; namely, Keith Harley and Faith  
21       Bugel. So I'll try and keep it plain.

22               My experience with the Title V program  
23       is relatively brief. I've only been involved in  
24       an effort regarding Title V -- several Title V